UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

JUN 14 1988

Joel Schneider, Esq.
Manta & Welge
One Commerce Square
2005 Market Street
37th Floor
Philadelphia, PA 19102

Re: U.S. v Nicolet et al., Civ. Ac. No. 85-3060

Dear Mr. Schneider:

Enclosed are two copies (revised and original) of the Proposed Plan accompanying the RI/FS for the site. (See Section 117 of CERCLA, 42 U.S.C. § 9617). The original is a copy of the Proposed Plan that was made available for review at the Ambler Branch of the Wissahickon Valley Public Library on 5/27/88. A revised version was prepared to address typographical/procedural mistakes - they do not affect the section on the description of alternatives or the section on preferred alternative. Please note that the Proposed Plan is a summary of the alternatives set forth in the RI/FS and no new information is contained.

Sincerely yours,

Lydia Isales
Assistant Regional Counsel

cc: Virginia Gibson-Mason, Esq.
David Street, Esq.
Jon Brooks, Esq.
John Mason, Esq.
[redacted]-Abreu-Cintrón

AR300041

SUPERFUND PROGRAM FACT SHEET
PROPOSED PLAN

EPA
REGION III

AMBLER ASBESTOS PILES SITE
AMBLER, PENNSYLVANIA

MAY 1988

The U.S. Environmental Protection Agency (EPA) has released for public comment the Remedial Investigation/Feasibility Study (RI/FS) for the Ambler Asbestos site in Ambler, Pennsylvania. The RI/FS discusses various alternatives for cleaning up contamination at the site. Based on this study, EPA, in consultation with the Commonwealth of Pennsylvania, has recommended the alternative that it believes will work most effectively at the Ambler Asbestos site. This alternative and the other possible cleanup alternatives that were examined and evaluated by EPA are described in this Proposed Plan. Words appearing in **bold print** throughout this Proposed Plan are defined in the glossary on page 11. EPA invites public comments on the Proposed Plan and the RI/FS through June 29, 1988. A meeting to discuss the plan will be held on June 16 at 7:00 p.m. in the Ambler Borough Hall, 31 East Butler Avenue, Ambler, Pennsylvania 19002.

This Proposed Plan describes:

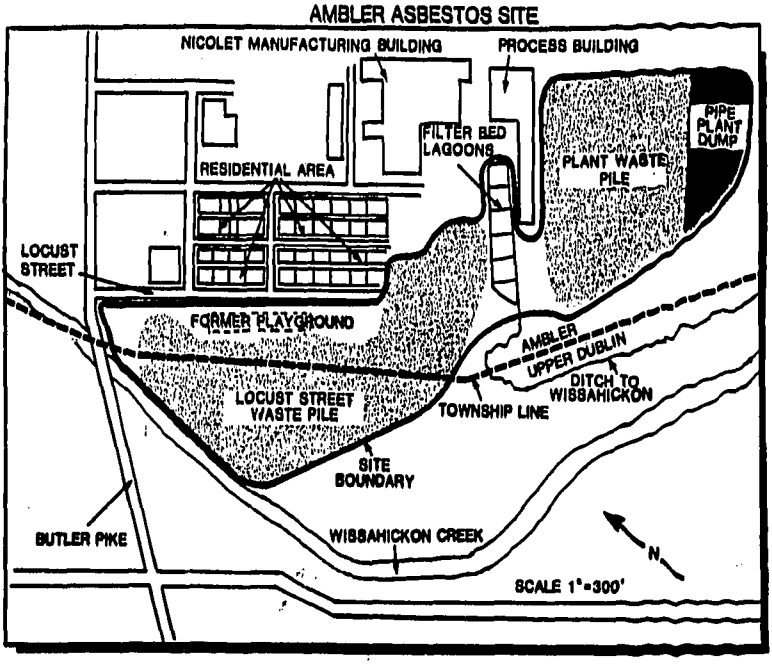
- The background of the Ambler Asbestos **Superfund** site;
- The nature of contamination at the site;
- Alternatives that have been considered for addressing site contamination;
- EPA's preferred alternative for cleaning up the sources of contamination; and
- Where you can go to review the **Remedial Investigation/Feasibility Study (RI/FS)** Report and other documents concerning the Ambler Asbestos site.

SITE BACKGROUND

The Ambler Asbestos site is located in the southwestern section of the Borough of Ambler, Montgomery County, Pennsylvania. The site area, about twenty-five acres, is bordered on the west by Wissahickon Creek, on the northwest by Butler Pike, on the north by Locust Street, and on the southeast by Church Street. A portion of the site extends westward from the Borough of Ambler into Upper Dublin Township. A tall chain link fence separates the northern border of the site from the nearest residences located 200 feet away on Locust Street. Behind Locust Street is a neighborhood of homes,

Exhibit A

AMBLER ASBESTOS SITE



approximately eight blocks in area. Three asbestos containing waste piles and a series of asbestos settling basins and filter beds exist on the site -- the result of years of manufacturing on the site.

EXTENT OF CONTAMINATION AT THE SITE

The Keasbey and Mattison Company owned the site property from the late 1800s to 1933. The company operated a pharmaceutical manufacturing plant until World War I, when the Keasbey-Mattison company became a leading producer of asbestos products. During the period when asbestos was manufactured at the facility, waste from asbestos production was placed in two large piles on the company property next to the plant. In 1962, Certainteed Corporation, a manufacturer of asbestos and cement pipes, purchased a portion of the facility from Keasbey-Mattison, including the pipe manufacturing plant and the pipe plant dump. Nicolet Industries, Inc., a manufacturer of building and automobile supplies, purchased the remaining plant facilities including the Locust Street Pile, the Plant Pile, and the asbestos filter bed lagoon. Both companies continued to add their wastes to the piles.

The Pennsylvania Department of Environmental Resources (PADER) and EPA first became actively involved with the waste pile problem in 1971 when a citizen complained about suspected asbestos contamination of ambient air and water in the Wissahickon Creek. Residents reported that they saw asbestos fibers in their homes and at the Locust Street playground during windy weather. EPA field studies conducted from November 1971 to January 1972 revealed that run-off from the Certainteed and Nicolet Piles contained asbestos in excess of background concentration limits specified in federal water quality criteria. From field test results, EPA also determined that long-term inhalation hazards did exist because of airborne asbestos in the vicinity of the site.

In 1973, PADER ordered Certainteed and Nicolet to stop dumping waste onto the piles. Shortly thereafter, Certainteed Corporation discontinued its operations at the site, covered and vegetated the Pipe Plant dump, and moved out of the region. The company still retains ownership of the Pipe Plant dump. Although staff have been reduced and production is limited, Nicolet

Industries still owns and operates the remaining portion of the site. Nicolet no longer uses the Locust Street or Plant Piles; however, the filter bed lagoons are still in use.

In December 1983, EPA determined that the site posed an imminent and substantial danger to public health and welfare and initiated an immediate removal action. The removal action included covering the Piles with topsoil, seeding the Piles with grass and other vegetation, and installing a system to drain water runoff at the Locust Street Pile. EPA completed the work in November 1984. At the request of EPA, Nicolet Industries covered and vegetated the Plant Pile in June 1984. Upon completion of these tasks, EPA again sampled several neighborhood homes for asbestos fibers and reported that nearby homes had not been contaminated by asbestos fibers during the removal action at the site. EPA has filed a cost recovery action against Nicolet and Turner-Newell for the recovery of costs associated with the 1984 removal action at the Locust Street Pile and RI/FS activities. In addition, in January 1988, EPA successfully negotiated a consent order with the Certainteed Corporation to investigate potential for asbestos contamination resulting from the Pipe Plant dump.

The Ambler Asbestos site was proposed for placement on EPA's Superfund National Priorities List in October 1984 and achieved NPL ranking in the fall of 1985. In May 1985 EPA began an RI to identify all potential sources of asbestos contamination and the way that asbestos may be released into the environment.

ALTERNATIVES FOR CLEANING UP THE SITE

Using information collected during the RI, EPA developed a Feasibility Study (FS) that describes and evaluates alternatives for cleaning up the sources of contamination at the Ambler Asbestos site. Each alternative was evaluated on the basis of how well it protects public health and the environment; its short-term and long-term effectiveness; how easy it is to implement; the extent to which it reduces the mobility, toxicity, and volume of contamination; its cost; and overall feasibility. In addition, each

alternative was evaluated to determine how well it meets current regulatory requirements.

In developing cleanup options for hazardous waste sites, EPA policy gives preference to remedies that utilize permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable. The alternatives for cleaning up the contaminant sources at the Ambler Asbestos site are summarized below. The costs for implementing each alternative includes current estimates of construction, implementation, operation, and maintenance. For a more in-depth analysis of each alternative, please consult the RI/FS report, a copy of which can be obtained at the information repository location listed on page 9.

In evaluating a number of cleanup options and technologies, EPA narrowed the range of possible alternatives to four. A brief description of each alternative follows:

- Alternative 1: No Action. EPA is required to include this alternative in the RI/FS for comparison with the other alternatives under consideration. EPA would select this alternative only if the site posed little or no risk to public health or the environment. Existing site security would be upgraded by installing and maintaining a fence around the perimeter of the site, and providing new access gates and appropriate warning/informational signs. In addition, biannual visual site inspections and potential environmental site monitoring would be performed for five years to evaluate the effectiveness of the alternative; annual inspections would be performed thereafter.

The No Action alternative does not meet EPA's goal of providing a permanent cleanup solution, nor does it comply with current statutory

requirements because of continuing risks posed by direct contact with the contaminants. It also does not address the majority of the public health and environmental issues identified in the RI/FS. The total estimated cost for implementing the No Action alternative is $386,000.

- Alternative 2: Excavation/Removal Off-Site Disposal. This alternative consists of complete excavation and removal of the Locust Street Pile, Plant Pile, and lagoon sediments. Contaminated materials would be excavated from the piles and the lagoon areas and shipped off site. The excavated materials would then be disposed of in an off-site, EPA-approved landfill. In addition, the lagoon surface water would be pumped out, treated, and disposed on site. The site then would be regraded and revegetated.

  This alternative would permanently remove the contaminated materials from the site. Long-term site monitoring would not be required because all contamination would be eliminated from the site. However, the short term risk to workers, area residents, and the environment due to the release of asbestos fibers during the excavation and disturbance of the piles would be significant. Testing would need to be conducted continually during the removal process to evaluate the stability of the piles, which could potentially collapse during the excavation process. EPA estimates the excavation/removal process would take seven years to complete and cost $109,653,000.

- Alternative 3: On-Site Vitrification/Stabilization. This alternative consists of treating asbestos-contaminated materials using a process that converts contaminated soil into a chemically inert, stable glass and crystalline product. This process is known as **vitrification**. Both the asbestos piles and lagoon sediments would be treated using this process and a stabilization process. This alternative would involve constructing a vitrification and/or stabilization plant(s) on the site. Contaminated materials then would be excavated or removed from the piles and lagoons and moved to the vitrification/stabilization plant.

  This alternative would require the excavation of the asbestos piles which will present a short term risk to workers, area residents, and the environment due to the release of asbestos fibers during the excavation and disturbance of the piles. If this technique were to be effective at the Ambler site, this alternative would provide a permanent remedial solution for the site by reducing the toxicity and mobility of the contaminated materials to **cleanup levels** which meet public health and environmental standards. This alternative may require several years of pre-implementation testing. This testing would help to determine the rate at which asbestos-contaminated materials could be cleaned up using this technique. However, due to the volume of asbestos at the site, vitrification would not be feasible. The estimated cost of this alternative is $270,116,000.

- Alternative 4: On-Site Closure. This alternative involves placing a **cap** system on each of the asbestos piles then placing clean fill in the

existing lagoon and settling basins. In addition, water from the lagoon and settling basins would be pumped out, filtered, and discharged on site. Fencing, locking gates, and surface water management and erosion control measures would be installed around the site. The cap system would consist of a layer of a geotextile material (a cloth-like material that will not dissolve in the ground) under a soil cover of three feet. The piles would be regraded to allow proper drainage, then revegetated. Sediments from the lagoons would remain in place then covered with a clean, compacted soil. Other measure would be taken to prevent the erosion of the Locust Street Pile where it adjoins the Wissahickon Creek bank.

This alternative will provide a barrier between the asbestos and the atmosphere and reduces the mobility of the asbestos. While this alternative does not reduce the toxicity or volume of the hazardous materials on site, it does address the threat to public health and the environment by containing the asbestos fibers. Long-term maintenance of the cap system will ensure the continued effectiveness of the cover system. This alternative is expected to take one year to complete at an estimated cost of $5,144,000.

EPA'S PREFERRED ALTERNATIVE

After careful consideration of the proposed cleanup solutions, EPA's preferred alternative for addressing contamination at the Ambler Asbestos site is Alternative # 4: On-Site Closure. EPA is proposing this alternative

because it can successfully address the potential pathways by which contaminants may migrate away from the site. Alternative 4 will provide a barrier between the asbestos and the atmosphere. While this alternative does not reduce the toxicity or volume of the hazardous materials on site, it does address the threat to public health and the environment by containing the asbestos fibers.

NEXT STEPS

EPA and the Commonwealth of Pennsylvania rely on public input so that the remedy selected for each Superfund site meets the needs and concerns of the local community. To assure that the community's concerns are being addressed, a public comment period on this Proposed Plan began on May 31, 1988 and will be held through June 29, 1988. This comment period will provide the community with an opportunity to comment on the RI/FS, the preferred cleanup solution, and the other proposed alternatives. Based on the findings of the RI/FS and public comments received, EPA and the Commonwealth of Pennsylvania will select a remedy for the contamination problem at the Ambler Asbestos site. The remedy selected will be documented in a **Record of Decision (ROD)** that summarizes EPA's decision process. The ROD is expected to be prepared this summer and will be available at the information repository identified below.

Copies of the RI/FS report and other site-related documents are available for public review at the following location:

Ambler Branch
Wissahickon Valley Public Library
209 Race Street
Ambler, Pennsylvania 19002
(215) 646-1072

PUBLIC COMMENT PERIOD AND PUBLIC MEETING

It is important to note that although EPA has selected a preferred alternative, no final decision has been made. All comments received during the public comment period will be considered and addressed by the agency.

EPA and the State of Pennsylvania will hold a public meeting at 7:00 p.m. on June 16, 1988 at the Ambler Borough Hall, 31 East Butler Avenue, Ambler, Pennsylvania 19002. During the meeting, EPA will present a summary of the RI/FS and the proposed remedy for the Ambler Asbestos site. Interested citizens also will be given an opportunity to ask questions and provide comments.

The public meeting will take place during a 30-day public comment period on the RI/FS Report and the Proposed Plan. The comment period began on May 31, 1988, and concludes June 29, 1988. Citizens are encouraged to review site-related documents and submit written comments to either:

Nanci Sinclair (3PA00)
Community Relations Coordinator
U.S. EPA - Region III
841 Chestnut Street
Philadelphia, PA 19107
(215) 597-4164

Hector Abreu-Cintron (3HW17)
Remedial Project Manager
U.S. EPA - Region III
841 Chestnut Street
Philadelphia, PA 19107
(215) 597-9562

Comments must be submitted to one of the above addresses on or before June 29, 1988.

GLOSSARY

Asbestos: A material used in buildings, pipes, and insulating materials because of its strength and heat-resisting qualities, has been found to cause lung cancer ant other respiratory problems. If not completely sealed, asbestos can break into tiny fibers that float in the air and can be inhaled or swallowed.

Cap: A layer of soil and/or synthetic materials placed over contaminated areas to prevent direct human contact with the contamination.

Cleanup Levels: Contaminant levels which do not present an unacceptable health risk to persons coming into direct contact with the site.

Lagoon: A shallow artificial pool or pond area.

Record of Decision (ROD): A public document describing EPA's final selection of a cleanup alternative at a Superfund hazardous waste site. The ROD is based on information and technical analysis generated during the RI/FS, and on public comments and community concerns about Agency actions.

Remedial Investigation/Feasibility Study (RI/FS): A two-part study of a Superfund hazardous waste site that must be completed before the site remedy can begin. The first part, the Remedial Investigation (RI), examines the nature and extent of site contamination. The second part, the Feasibility Study (FS), identifies and evaluates alternatives for addressing site contamination based on the results of the RI.

Removal Action: A prompt response designed to address immediate, significant risks to human health and the environment at a Superfund site.

Superfund: The common name for the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980. CERCLA gives EPA the authority to respond to hazardous waste problems that threaten public health and the environment. CERCLA established a trust fund known as Superfund that helps pay for the investigation and cleanup of hazardous waste sites. In 1986, Congress reauthorized CERCLA with the Superfund Amendments and Reauthorization Act (SARA) which, in addition to providing additional funds, added additional statutory requirements for investigating and cleaning up sites.

Surface Water: Bodies of water on the earth's surface that are exposed to the air such as streams, rivers, lakes, and oceans.

Vitrification: A thermal treatment process that converts contaminated soil into a chemically inert, stable glass and crystalline product. Contaminated material is transformed by melting, at extremely high temperatures, into a non-toxic glass-like substance when cooled.